

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
JOSEPH THOMAS KONUPKA, III	:	CASE NO. 1:18-bk-00799
aka Joseph Thomas Konupka	:	
	:	
Debtor	:	
	:	
CRESCENT MORTGAGE COMPANY	:	
Movant	:	
	:	
JOSEPH THOMAS KONUPKA, III	:	
	:	
aka Joseph Thomas Konupka	:	
Respondent	:	
	:	

ANSWER TO MOTION FOR RELIEF FROM STAY

1. Admitted.
2. Admitted.
3. Admitted.
4. This paragraph paraphrases of a portion of a document, which is attached to as an exhibit to the Motion and which speaks for itself; to the extent that this paraphrase conflicts with the actual wording or meaning of the document, it is denied.
5. Admitted that the filing of a bankruptcy petition acts as a stay upon certain foreclosure actions.
6. Admitted; however, the debtor intends to cure any arrearages within a reasonable time.
7. Admitted that is the approximate amount.
8. Denied. The trustee's payment website shows that the debtor is current.
9. The Debtor lacks knowledge or information sufficient to form a belief as to the truth of this averment, and therefore denies the same.
10. The Debtor lacks knowledge or information sufficient to form a belief as to the truth of this averment, and therefore denies the same.

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Kara K. Gendron
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